

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

PRESIDIO, INC., PRESIDIO NETWORKED )  
SOLUTIONS LLC, and PRESIDIO )  
NETWORKED SOLUTIONS GROUP, LLC, )  
)  
) Case No. 2:21-cv-05779  
)  
) Chief Judge Algenon Marbley  
Plaintiffs, )  
)  
) Magistrate Judge Deavers  
v. )  
)  
)  
PEOPLE DRIVEN TECHNOLOGY, INC., )  
JOSEPH SCHAUMLEFFEL, and THOMAS )  
SCHLOTTERER, )  
)  
)  
)  
Defendants. )

**STIPULATED PRELIMINARY INJUNCTION AGAINST DEFENDANTS JOSEPH  
SCHAUMLEFFEL AND PEOPLE DRIVEN TECHNOLOGY, INC.**

WHEREAS, Plaintiffs Presidio, Inc., Presidio Networked Solutions LLC, and Presidio Networked Solutions Group, LLC (collectively, “Presidio”) commenced the instant action against Defendants People Driven Technology, Inc. (“PDT”), Joseph Schaumleffel (“Schaumleffel”), and Thomas Schlotterer (“Schlotterer” and together with PDT and Schaumleffel, “Defendants,” and together with Presidio, the “Parties”), with the filing of the complaint on December 14, 2021 (ECF Doc. No. 1); and

WHEREAS, on December 15, 2021, Presidio moved this Court for issuance of a temporary restraining order and preliminary injunction against Defendants pursuant to Fed. R. Civ. P. 65 (ECF Doc. No. 8) (the “Motion”); and

WHEREAS, the Parties stipulated to and the Court so-ordered a *Stipulated Temporary Restraining Order* dated December 29, 2021 (ECF Doc. No. 22) (the “Stipulated TRO”), which resolved that portion of the Motion that sought a temporary restraining order; and

WHEREAS, the Parties are parties to a Computer Forensic Protocol, dated February 1, 2022, governing the forensic imaging, analysis, and remediation of devices, accounts, and other repositories of Schaumleffel and Schlotterer identified in Exhibit A to the Stipulated TRO, which may contain confidential information or trade secrets belonging to Presidio (the “Forensics Protocol”); and

WHEREAS, Presidio and Schlotterer stipulated to an *Agreed Preliminary Injunction Regarding Defendant Schlotterer*, dated February 17, 2022 (ECF Doc. No. 39) (the “Schlotterer PI”), which is pending the Court’s review and, if so ordered, would resolve that portion of the Motion as sought a preliminary injunction against Schlotterer; and

WHEREAS, PDT and Schaumleffel do not oppose the relief set forth in Presidio’s proposed preliminary injunction against them;

**NOW, THEREFORE, IT IS HEREBY ORDERED** that:

1. PDT and Schaumleffel, as well as all persons acting in concert with them, who receive notice of this Order, are enjoined and ordered as follows pending final adjudication of the above-captioned action:
  - a. PDT and Schaumleffel shall refrain from directly or indirectly using, disclosing, copying, or transmitting Presidio’s confidential or trade secret information for any purpose.
  - b. PDT and Schaumleffel shall return to Presidio all originals, copies, or other reproductions in any form whatsoever, of any record or document containing, in

whole or in part, any confidential information or trade secrets belonging to Presidio (“Presidio Information”).

- c. PDT and Schaumleffel shall preserve and not otherwise tamper with or modify in any way, the hard drives of any of personal computers phones, or other electronic devices, or accounts or repositories, in their possession, custody, or control, which are known or reasonably should be known to contain Presidio Information (collectively, “Devices”).
  - d. Upon discovery of any Devices in their possession, custody, or control not listed in Exhibit A to the Stipulated TRO that PDT, Presidio, and Schaumleffel reasonably believe may contain Presidio Information related to this litigation, PDT and Schaumleffel shall promptly surrender such Devices for handling pursuant to the Forensics Protocol or otherwise work with counsel to ensure the preservation of discoverable information in this litigation. Counsel will work in good faith to resolve any issues regarding the application of this paragraph.
2. By agreeing to this Order, PDT and Schaumleffel do not admit any liability or that any Presidio Information constitutes confidential or trade secret information. PDT and Schaumleffel deny liability and preserve all available defenses.
  3. PDT and Schaumleffel shall not act in concert with anyone to violate the terms of this Order.
  4. Nothing herein shall be deemed to affect the Forensics Protocol or Schlotterer PI, which remain in full force and effect.

5. The Motion is deemed resolved and the Clerk of Court is directed to remove the previously scheduled hearing on the Motion, and all antecedent briefing deadlines in connection with the Motion, from the calendar.
6. This Order shall remain in effect pending full adjudication of the above-captioned action.

Agreed to:

Dated: February 25, 2022

/s/ D. Michael Crites

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*Attorneys for Defendant Thomas Schlotterer*

**IT IS SO ORDERED.**

**DATED: March 3, 2022**



**ALGENON L. MARBLEY**  
**UNITED STATES DISTRICT JUDGE**